

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1962 & 2110

**CERTIFICATION OF COUNSEL REGARDING SUPPLEMENTAL ORDER (I)
SETTING A BAR DATE FOR FILING PROOFS OF CLAIMS FOR PRE-CLOSING
ADMINISTRATIVE EXPENSE CLAIMS AGAINST DEBTORS, (II) ESTABLISHING
PRE-CLOSING ADMINISTRATIVE EXPENSE CLAIM PROCEDURES, AND (III)
GRANTING RELATED RELIEF, INCLUDING NOTICE AND FILING PROCEDURES**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On February 7, 2025, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 1962] (the “**Procedures Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).² Attached as Exhibit A to the Procedures Motion was a proposed form of order

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms not defined herein have the meanings ascribed to them in the Procedures Motion.

granting the relief requested therein (the “**Proposed Order**”). The Proposed Order stated that Exhibit 4 to the Proposed Order was the Pre-Closing Administrative Expense Claims Schedule.

2. After a hearing on the matter on February 26, 2025, the Debtors filed the *Certification of Counsel Regarding Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 2102]. The Debtors omitted Exhibit 4, the Pre-Closing Administrative Expense Claims Schedule, from the submitted form of order.

3. On February 27, 2025, the Court entered the *Order (I) Setting a Bar Date for Filing Proofs of Claims for Pre-Closing Administrative Expense Claims Against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures* [D.I. 2110] (the “**Order**”). The Order did not include Exhibit 4.

4. The Debtors have supplemented the Order to include the updated Pre-Closing Administrative Expense Claims Schedule (the “**Supplemental Order**”) as Exhibit 4 and the service versions of the Pre-Closing Administrative Expense Claims Notices as Exhibits 2 and 3.

5. No other changes have been made to the Order.

WHEREFORE, the parties respectfully request that this Court enter the Supplemental Order, substantially in the form attached as **Exhibit 1** hereto, which includes the Pre-Closing Administrative Expense Claims Schedule as Exhibit 4.

[Signature page follows]

Dated: March 5, 2025
Wilmington, Delaware

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